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13
**UNITED STATES DISTRICT COURT
 14 DISTRICT OF NEVADA**

15 Steve Marin, an individual, Mary Gonzales,
 16 an individual,

17 Case No. 2:24-cv-01127-APG-NJK

18 Plaintiffs,

19
**Stipulation and Order to
 20 Extend Discovery Deadlines
 21 (Second Request)**

22 v.

23 UNITED STATES OF AMERICA; DOES I
 24 through X; ROE CORPORATIONS I
 25 through X, inclusive.

26 Defendants.

27 Pursuant to LR IA 6-1 and LR 26-3, the parties request a sixty (60) day extension of
 28 discovery deadlines, which is supported by grounds and circumstances set forth below. This
 stipulation is filed at least 21 days before the earliest deadline to be extended (expert
 disclosures). The current deadline for expert disclosures is May 27, 2025. The parties have
 conducted discovery diligently and in good faith. This is the second request for an extension
 of the discovery deadlines.

29
DISCOVERY COMPLETED

30 The parties have completed the following discovery:

31 1. The Federal Defendant made its initial disclosures on December 5, 2024.
 32 2. Plaintiffs made their initial disclosures on December 5, 2024.

- 1 3. The Federal Defendant requested HIPPA authorization from Plaintiff on
- 2 January 13, 2025, and received them on January 21, 2025.
- 3 4. The Federal Defendant served written discovery requests on Plaintiff Steven
- 4 Marin on January 22, 2025.
- 5 5. The Federal Defendant served written discovery requests on Plaintiff Maria
- 6 Gonzales on January 22, 2025.
- 7 6. The Federal Defendant subpoenaed medical records from Plaintiffs' known
- 8 medical providers on January 28, 2025.
- 9 7. Plaintiffs served their responses to Federal Defendant's first sets of
- 10 Interrogatories and Requests of Production on February 21, 2025.
- 11 8. Plaintiffs served their firsts sets of Interrogatories, Requests for Production and
- 12 Requests for Admission to Federal Defendant on March 21, 2025.
- 13 9. The Federal Defendant served its First Supplement to Initial Disclosure of
- 14 Witnesses and Documents Pursuant to Fed. R. Civ. P. 26 on April 22, 2025.
- 15 10. The Federal Defendant scheduled Plaintiff Mary Gonzales and Plaintiff Steve
- 16 Marin's depositions on May 20, 2025.

DISCOVERY REMAINING

The Federal Defendant is expecting to receive the remainder of Plaintiffs' medical records and to take Plaintiffs' depositions on May 20, 2025. The Federal Defendant will provide its responses to Plaintiffs' discovery requests. The parties will need to take the depositions of Plaintiffs' medical providers, designate initial and rebuttal experts, and depose expert witnesses.

The parties reserve the right to engage in any other discovery permitted by applicable rules and within the revised discovery deadlines if the court approves this stipulation.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

Since the Order granting the Stipulation to Continue to Discovery (ECF No. 14), the parties have been working diligently to advance discovery. The Federal Defendant has

1 been following up with some of the medical providers regarding Plaintiffs' medical records
2 since February and has recently received the medical records from the following medical
3 providers: for Plaintiff Mary Gonzales: Shadow Emergency Physicians, Desert Radiology,
4 Opensided MRI, Pueblo Medical Imaging; for Plaintiff Steve Marin: Shadow Emergency
5 Physicians, Desert Radiology, Pueblo Medical Imaging and Injury Rehab Associates.
6 Currently, the Federal Defendant is expecting to receive the following outstanding medical
7 records from Plaintiffs' medical providers: for Plaintiff Mary Gonzales from Injury Rehab
8 Associates and a signed Certification of Records from Opensided MRI; for Plaintiff Steve
9 Marin from Extremities Surgical Institute and Injury Center of Nevada. The Federal
10 Defendant has sent numerous follow up requests to said providers without a response to
11 date and if needed will file motions to compel these records. The Federal Defendant is
12 unable to provide a complete copy of Plaintiffs' medical records to its experts due to the
13 lack of response from said providers.

14 The Federal Defendant respectfully requests an extension of remaining discovery
15 deadlines to be able to obtain the remainder of Plaintiffs' medical records and provide them
16 to its experts for review. Additionally, if an extension is granted, it will allow the Federal
17 Defendant to provide the Plaintiffs' deposition transcripts to its experts to review them
18 before providing their respective expert opinions.

19 The parties conferred and agreed that a 60-day extension of all remaining discovery
20 deadlines would be proper. Neither party will be prejudiced by the proposed extension and
21 may be prejudiced if the currently discovery schedule remains in place. The parties agree
22 that the extension is sought in good faith.

23 **EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

24 The following table sets forth the current deadlines and the proposed extended
25 deadlines that are the subject of this stipulated request:

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27 ///
28 ///

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Initial Expert Disclosure	May 27, 2025	July 28, 2025
Rebuttal Expert Disclosure	June 25, 2025	August 25, 2025
Discovery Cutoff	July 28, 2025	September 26, 2025
Dispositive Motions	August 25, 2025	October 24, 2025
Joint proposed pretrial order	September 23, 2025	November 24, 2025¹

This request for an extension of time is not sought for any improper purpose including delay. This is the second request for an extension of discovery deadlines in this matter.

Respectfully submitted this 6th day of May 2025.

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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: May 6, 2025

¹ However, if dispositive motions were to be filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.